The public interest of providing an opportunity for women to participate in spectrum-based services was recognized by Congress in Section 309(j) of the Omnibus Budget Reconciliation Act of 1993 (the "Budget Act") and in the legislative history to the Cable Television Consumer Protection and Competition Act of 1992 (the "1992 Cable Act").[59] In the Budget Act, Congress directed the Commission to develop competitive bidding rules that promote "economic opportunity and competition and ensure that new and innovative technologies are readily accessible to the American people by avoiding excessive concentration of licenses and by disseminating licenses among a wide variety of applicants, *including small businesses, rural telephone companies, and businesses owned by minorities and women.*"[60] In the House Report on the 1992 Cable Act, the Energy and Commerce Committee noted:

> "The Courts and the Commission have consistently recognized the increasing amount of programming designed to address the needs and interests of minorities and women is fundamentally related to the number of minority and women employees in the upper level positions within media companies. In addition, the Committee recognizes that a strong EEO policy is necessary to assure sufficient numbers of minorities and women gain professional and management level experience within the television industry, and *thus that significant numbers of minorities and women obtain the background and training to take advantage of existing and future television broadcasting ownership opportunities. . . . The Committee notes that women and minorities are still significantly under-represented as employees and owners in the industry.*"[61]

Additional case law further supports the conclusion that promoting economic opportunity for women is an important governmental interest. According to the U.S. Supreme

[59] 47 U.S.C. §309(j).

[60] 47 U.S.C. § 309(j) (emphasis added).

[61] H.R. Report No. 102-628, 102d Cong., 2d Sess., at 144 (1992) (emphasis added).

Court, "[r]eduction in the disparity in economic condition between men and women caused by the long history of discrimination against women has been recognized as such an important governmental objective." *Califano v. Webster*, 430 U.S. 313, 317 (1977). *See also Associated General Contractors v. City and County of San Francisco*, 813 F.2d 922 (9th Cir. 1987) (remedying disadvantages women face in the marketplace is an important governmental interest); *Coral Construction Co. v. King County*, 941 F.2d 910, 932 (9th Cir. 1991) (the county "has a legitimate and important interest in remedying the many disadvantages that confront women business owners").

V. THERE IS AN IMPORTANT AND LEGITIMATE GOVERNMENT INTEREST IN PROMOTING VIEWPOINT DIVERSITY THROUGH DIVERSE MASS MEDIA OWNERSHIP

The Commission's goal of ensuring a diversity of viewpoints in broadcast media provides a second and independent basis for the adoption of incentives for increasing female ownership. As acknowledged by the Commission in the Notice, the D.C. Circuit's decision in *Lamprecht v. FCC*[62] requires that the Commission develop a strong record demonstrating that female ownership promotes viewpoint diversity. The decision by the Court in *Lamprecht*, however, does not prohibit the adoption of policies to promote female ownership of mass media facilities provided that a nexus between ownership and viewpoint diversity can be established. Evidence demonstrating the differing choices that women make on issues and in viewpoint is provided in the comments filed by the Citizens Communications Center Project in this docket. The research and analysis presented by the Citizens Communications Center Project demonstrate that a nexus does exist between female ownership and viewpoint

[62] 958 F.2d 382, 395 (D.C. Cir. 1992).

diversity. AWRT also has asked the Commission and NTIA to study the nexus between female ownership and broadcast diversity in a study on female ownership.[63]

The Citizens Communications Center Project also appropriately demonstrates in its comments that the Court in *Lamprecht* was overly narrow in its analysis by citing as the appropriate nexus a nexus between women ownership and "women's programming". The appropriate analysis lies in a broader definition of viewpoint diversity as the diversity of perspectives and experiences rather than programming that can be identified and labeled as gender specific programming. In addition, as demonstrated in Section III.C.2.above, women owners must often sacrifice their programming dreams to obtain the financing necessary to even acquire broadcast licenses.

VI. THE COMMISSION SHOULD ADOPT AN INCUBATOR PROGRAM AND EXTEND THE RELAXED OWNERSHIP RULES RECENTLY APPLIED TO MINORITIES TO WOMEN

A. AWRT Supports the Adoption of an Incubator Program

AWRT supports the adoption of an incubator program that would apply to women and minority operators. AWRT agrees that an incubator program will help bridge the gap that currently separates women entrepreneurs from the financing and industry expertise required to acquire mass media facilities. For the incubator program to achieve its goal of increasing female and minority ownership of broadcast stations, the program must be sufficiently flexible to permit both the incubator and the incubated station to benefit. The Commission's proposal to permit a broadcast owner to exceed the national ownership limits provides a direct and significant incentive for owners to incubate women owned stations. The requirements for

[63] *See* Exhibit 1.

incubation must be general enough to permit the parties to negotiate a successful arrangement and so as not to dilute the incentive for the creation of incubator programs. Every restriction will be weighed by group station owners in deciding whether to establish an incubator program.

AWRT urges the Commission to adopt an incubator program for all mass media services, including cable television and MMDS with the following broad guidelines:

(1) The incubator program should apply to women and minorities but not small businesses.

(2) Group owners should be able to acquire one additional station or system beyond the national ownership limits for every four women or minority owned stations or systems incubated. AWRT proposes a four rather than two station incubation requirement as a means to ensure the group owner's commitment to female owned and minority owned stations. In addition, AWRT believes that this higher number rather than a test of comparable value will best serve to increase female ownership.

(3) Group owners should only be able to acquire up to three additional stations or systems through the incubator program.[64]

(4) The FCC should not impose a minimum period for the incubator program. Imposition of a one-year period could chill use of the program by group station owners given the speed with which broadcast stations and cable stations are acquired and the associated cost of delay. AWRT endorses the requirement proposed by the Commission that would require the incubated facility to have purchased the facility and become operational subject to a one-year holding requirement on the part of the incubated owner.

(5) The incubator program established by the group owner should include each of the three elements identified by the Commission in the Notice: (1) financial; (2) operational; and (3) training assistance. The greatest weight should be placed on financial assistance as a means of assisting

[64] If the program proves successful and several group stations reach the maximum number of additional stations acquired, the FCC could evaluate whether the program has achieved its goal and can be eliminated or should be extended.

women to overcome the barriers they face in raising capital. The amount of financial assistance could be calculated as a percentage of the purchase price of the additional station by the incubator and divided among the four incubated stations. Alternatively, the incubator could be required to provide or assist the female or minority station owners in acquiring a minimum of 50% of the capital required to purchase the incubated stations.

AWRT urges the Commission not to modify the local ownership limits as part of the incubator program and not to require that the stations purchased be within five markets of the incubated facility's market. The market opportunities best suited for the group station owner and the incubated stations will depend on the attributes of each owner. Group station owners seeking to acquire stations in large markets may not be able to find a sufficient number of stations to incubate in markets within the range specified by the Commission. By contrast, the group station owner may be able to more readily identify four women and minority owned businesses seeking to acquire stations at different market levels. To achieve the goal of increasing female ownership the focus should be on ownership of stations and systems not particular markets. The Commission should monitor the trend in station ownership acquired through an incubator program, however, to ensure that women and minorities are not directed by group station owners to smaller markets.

B. The Attribution Rules Should Be Relaxed for Women-Owned Businesses

AWRT supports the relaxation of the attribution rules at the national level as a means to promote investment in women-owned companies seeking to acquire mass media facilities. Specifically, AWRT supports adoption of the attribution rules that parallel the rules applied to women-owned companies bidding for PCS licenses in the entrepreneurs' block. These rules require that women hold 50.1% of the voting stock in corporations and all of the general partnership interests in partnership structures. By requiring voting and management control to be held by women, these rules ensure that women will retain control over the mass media facilities. At the same time the competitive bidding rules recognize the harsh reality that women face in raising capital. Until capital is more accessible to women and women have acquired more economic strength, a minimum 15% equity stake will give women significant flexibility to obtain the capital necessary to purchase mass media facilities.

AWRT endorses the Commission's proposal to ensure that female and minority owners actually control the licensee. This can be achieved by requiring that women and/or minorities certify that they will have *de facto* control of the licensed company and that the investors taking advantage of the exception do not exercise control over day-to-day operation of the broadcast station or cable system. AWRT urges the Commission to subject stations with investors benefitting from these rules to scrutiny and audits for continued compliance with the Commission's rules.

C. The Commission Should Extend The Ownership Limits for Minorities to Include Women

Based on the low level of women-ownership in the radio industry, AWRT urges the Commission to extend its recently revised national radio ownership limit rules for minorities to women.[65] Last year, the Commission revised its national radio ownership rules to permit non-minority owners to hold non-controlling interests in five stations above the national caps provided that the additional stations are controlled by minorities. In addition, the minority national cap was expanded to permit a minority owner to own 25 AM and 25 FM stations --

[65] AWRT takes no position on the issues raised by the Commission in a separate proceeding regarding general modification of the ownership limits.

five stations in excess of national ownership limits. Similar policies are warranted for women. As demonstrated in Sections Ii and III above, women encounter the same barriers that minorities face in acquiring radio stations. Although women compose 51% of the population in 1990, the latest available data indicates that women owned only 3.8% of the radio stations in the United States. Parallel extension of the national radio ownership caps for non-controlling investments in women-owned stations would further promote investment in women-owned stations a pre-condition to increase broadcast ownership by women. Similarly, the national ownership caps for television and radio should be adopted for women as they currently apply and are proposed for minorities.

VII. CONCLUSION

Based on the strong data documenting the barriers to capital that women face in entering the mass media industry and the diversity of viewpoint they bring to media, AWRT urges the Commission to:

(1) adopt an incubator program to facilitate incubation of women-owned companies;

(2) relax the attribution rules to be consistent with the Commission's competitive bidding rules for women-owned companies bidding for PCS licenses;

(3) extend the ownership cap limits for attributable investments in minority-owned stations and for minority-owned stations to women;

(4) conduct a study on current level of female ownership of mass media facilities; and

(5) amend the Annual Ownership Report Form 323 to collect information on the gender and race of the licensees.

Respectfully submitted,
AMERICAN WOMEN IN RADIO
AND TELEVISION, INC.

Shelley L. Spencer

Shelley L. Spencer
Vice President, Government Relations
American Women In Radio and Television, Inc.
c/o Swidler & Berlin, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7798

Dated: May 17, 1995

LIST OF EXHIBITS

ANDREWS OFFICE PRODUCTS CAPITOL HEIGHTS, MD (K)

Exhibit 1

american women in radio and television inc.
1650 Tysons Boulevard, Suite 200, McLean, Virginia 22102 (703) 506-3290 Fax (703) 506-3266

May 2, 1995

BY HAND DELIVERY

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

The Honorable Larry Irving
Assistant Secretary for Communications & Information
National Telecommunications and Information Administration
14th and Constitution Avenue, N.W.
Room 4898
Washington, D.C. 20230

Re: Request for Study on Level of Female Ownership of Communications Companies

Dear Chairman Hundt and Assistant Secretary Irving:

On behalf of American Women in Radio & Television, Inc. ("AWRT"), I am writing to formally request that the Federal Communications Commission and the National Telecommunications and Information Administration undertake a study on female ownership of communications companies and barriers women may face in obtaining ownership positions.

As a strong advocate for promoting ownership of communications establishments by women, AWRT has researched the availability of data on female ownership of communications companies and determined that the data is outdated and insufficient. Currently, NTIA collects data on minority ownership of radio and television stations but does not collect data on female ownership. In addition, NTIA's recently released report, "Capital Formation and Investment in Minority Business Enterprises in the Telecommunications Industries," documents the barriers minorities face in accessing the capital required to acquire communications properties. A similar study regarding the barriers faced by women is clearly warranted.

The FCC currently does not collect data on the gender or race of broadcast and television licensees. However, the FCC does have policies that provide incentives to increase minority ownership of mass media and cable stations. No such incentives exist for female ownership although the FCC currently is considering the need for the adoption of such incentives for women in a pending rulemaking.

The collection of data and a comprehensive study of the level of female ownership of communications establishments is important to the formulation of appropriate policies and programs for women by the FCC and NTIA. Only with the facts in hand can appropriate federal policies be developed.

AWRT requests that FCC and NTIA undertake a study of the level of female ownership that would include in its scope the issues addressed for minorities in the NTIA report on barriers to capital and the following eight areas:

1. Definition of the communications industry. What is included (what Standard Industrial Classification Codes), *i.e.*, broadcast, radio, cable, wireless cable, and telecommunications.

2. Historical growth of the communications industry in relation to growth of industry generally.

3. Historical employment growth by gender in the communications industry vs. industry as a whole.

4. Historical business ownership growth of women in the communications industry vs. industry as a whole.

5. Detailed analysis of the communications industry with special emphasis on the role of women in the industry using the historical data gathered above and other contemporary factors (*i.e.*, special characteristics of the industry).

6. General requirements for entry into the industry, *i.e.*, capital requirements, ownership experience, etc.

7. Barriers to capital and all other institutional factors that negatively affect women's participation in the industry (for example, financing terms, equity investments, capital intensive nature of the industry,

discrimination against women, etc.).

8. Empirical study of the nexus between women's ownership of mass media facilities and content diversity (programming – at least news, public affairs, and editorial content and if a nexus can be established entertainment) and diversity of workforce (*i.e.*, hiring and advancement), communications access and products targeted towards women.

In addition, to assist in the collection of data, AWRT requests that as soon as possible the FCC require all radio and television station owners to submit a revised Ownership Form 323 that would identify the gender and race of the licensee and thereafter require the submission of this information with Form 323 on an annual basis. While the form change will require approval by the Office of Management and Budget, such a change can be expedited pursuant to 5 C.F.R. § 1320.18. In 1988, the FCC expeditiously approved a similar form change when the FCC required a one-time collection of information report to collect data on minority and women ownership of television and broadcast stations.

AWRT looks forward to working with the FCC and NTIA in developing appropriate programs and policies for ownership of communications facilities by women. Should you want to discuss our request in further detail, please call me at (202) 424-7798.

Sincerely,

Shelley L. Spencer

Shelley L. Spencer

cc: Anthony Williams
Cathy J.K. Sandoval
Tatia Williams
Linda Tremere (President, AWRT)
Terri Dickerson (Executive Director, AWRT)
Ilene Penn (Institute for Public Representation)

139342.1

Exhibit 2

1987 Economic Censuses

WB87-1

Women-Owned Businesses

Issued August 1990

U.S. Department of Commerce
Robert A. Mosbacher, Secretary
Thomas J. Murrin, Deputy Secretary
Michael R. Darby, Under Secretary for Economic Affairs

BUREAU OF THE CENSUS
Barbara Everitt Bryant, Director

SUMMARY OF FINDINGS

Women-owned firms increased 57.5 percent from 2,612,621 in 1982 to 4,114,787 in 1987. Receipts increased 183 percent from $98.3 billion to $278.1 billion. At least part of the increase can be attributed to a change in IRS regulations which gave tax advantages to business firms filing as subchapter S corporations. Many firms changed their form of ownership from partnerships and other kinds of corporations to subchapter S corporations for the tax benefits. This resulted in artificial increases in total women-owned firms as well as women-owned subchapter S corporations because other corporations are not included in this survey universe.

See table A for a comparison of the increase for women-owned firms and for all U.S. firms.

Table A. **Percent Increase by Legal Form of Organization for Women-Owned Firms Compared to All U.S. Firms: 1982 to 1987**

Legal form of organization	Percent increase	
	Women-owned firms	All U.S. firms
Individual proprietorships	55.8	28.0
Partnerships	16.1	10.4
Subchapter S corporations	165.5	106.4
Other corporations	(NA)	4.1

INDUSTRY CHARACTERISTICS

In 1987 the majority of women-owned firms were concentrated in the service industries. These industries accounted for 55.1 percent of all women-owned firms but only 22 percent of gross receipts. The next largest concentration of women-owned firms was in retail trade with 19.4 percent of the firms and 30.7 percent of the receipts.

The 10 industry groups accounting for the largest dollar volume of receipts for women-owned firms in 1987 are summarized in table B.

GEOGRAPHIC CHARACTERISTICS

California had the largest number of firms (559,821) and receipts ($31 billion), accounting for 13.6 percent of all women-owned firms and 11.2 percent of their receipts. Texas had the second largest number of firms (298,138) but ranked sixth in receipts with $13.4 billion, accounting for 7.2 percent of all women-owned firms but only 4.8 percent of their receipts. New York was slightly behind

Table B. **Ten Largest Major Industry Groups in Receipts for Women-Owned Firms: 1987**

SIC code	Major industry group	Firms (number)	Receip (millic dollar
51	Wholesale trade—nondurable goods	39 514	24 0
59	Miscellaneous retail	546 353	21 1
55	Automotive dealers and service stations	20 942	20 2
73	Business services	690 494	18 9
50	Wholesale trade—durable goods	42 999	18 7
54	Food stores	48 469	14 4
58	Eating and drinking places	90 848	14 1
65	Real estate	335 429	12 6
72	Personal services	561 695	10 2
80	Health services	235 318	9 6

Texas in number of firms (284,912) but was second receipts with $30 billion. New York accounted for 6 percent of all women-owned firms but 10.8 percent of th receipts.

Table C shows the 10 metropolitan statistical are (MSA's) with the largest number of women-owned firr and compares the firms and receipts in these MSA's w the number in their respective States. These 10 MS/ account for 20 percent of the total number of wome owned firms in the United States and 25 percent of t gross receipts.

LEGAL FORM OF ORGANIZATION

The majority of women-owned firms operated as in vidual proprietorships in 1987 (3,722,544 or 90.5 perce down from 91.5 percent in 1982). This group accounted 29 percent of gross receipts compared to 49.7 percen 1982. Of the total number of firms, 155,760 or 3.8 perc were partnerships, accounting for 10.5 percent of grc receipts. Partnerships accounted for 5.1 percent of women-owned firms and 19.9 percent of gross receipt 1982. Subchapter S corporations accounted for only percent of the total number of firms but 60.5 percent gross receipts. This is up from 3.4 percent of the firms 30.4 percent of gross receipts in 1982. (See the paragraph of the Summary of Findings.)

SIZE OF FIRM

Women-owned firms with paid employees accour for 15 percent of the total number of firms and 80.5 perc of gross receipts. There were 2,937 firms with 100 emp ees or more which accounted for $53 billion in g receipts (19.2 percent of the total receipts of empl firms).

Table C. Comparison of Women-Owned Firms in 10 Largest Metropolitan Statistical Areas With Women-Owned Firms in State: 1987

[For definition of MSA's, see appendix B]

MSA	Firms (number)	Receipts ($1,000)	State	Firms (number)	Receipts ($1,000)	Percent MSA to State	
						Firms	Receipts
Los Angeles-Long Beach, CA PMSA	162 417	10 775 455	California	559 821	31 026 855	29	35
New York, NY PMSA	136 209	17 314 335	New York	284 912	29 969 920	48	58
Chicago, IL PMSA	89 424	9 195 448	Illinois	177 057	13 884 278	51	66
Washington, DC-MD-VA MSA	78 744	4 940 165	District of Columbia	(X)	(X)	(X)	(X)
Philadelphia, PA-NJ PMSA	68 032	6 748 908	Pennsylvania	167 362	13 339 231	41	51
Houston, TX PMSA	59 866	2 652 715	Texas	298 138	13 384 958	20	20
Boston, MA PMSA	58 975	7 544 694	Massachusetts	111 376	11 139 810	53	68
Detroit, MI PMSA	58 791	4 182 607	Michigan	133 958	7 889 112	44	53
Dallas, TX PMSA	55 452	2 721 988	Texas	298 138	13 384 958	19	20
Anaheim-Santa Ana, CA PMSA	54 367	3 266 368	California	559 821	31 026 855	10	11

Table D. Comparison of Women-Owned Firms in 10 Largest Counties With Women-Owned Firms in State: 1987

County	Firms (number)	Receipts ($1,000)	State	Firms (number)	Receipts ($1,000)	Percent county to State	
						Firms	Receipts
Los Angeles, CA	162 417	10 775 455	California	559 821	31 026 855	29	35
Cook, IL	70 922	7 611 707	Illinois	177 057	13 884 278	40	55
Orange, CA	54 367	3 266 368	California	559 821	31 026 855	10	11
New York, NY	54 186	8 914 477	New York	284 912	29 969 920	19	30
Harris, TX	52 474	2 420 478	Texas	298 138	13 384 958	18	18
San Diego, CA	47 450	2 201 124	California	559 821	31 026 855	8	7
Dallas, TX	40 338	2 226 982	Texas	298 138	13 384 958	14	17
Maricopa, AZ	37 407	1 900 336	Arizona	60 567	2 910 886	62	65
King, WA	35 267	1 652 997	Washington	90 285	4 689 046	39	35
Dade, FL	32 937	2 953 640	Florida	221 361	16 828 094	15	18
Santa Clara, CA	31 062	1 399 470	California	559 821	31 026 855	6	5

Table E. Comparison of Women-Owned Firms in 10 Largest Cities With Women-Owned Firms in State: 1987

City	Firms (number)	Receipts ($1,000)	State	Firms (number)	Receipts ($1,000)	Percent city to State	
						Firms	Receipts
New York, NY	109 903	14 698 053	New York	284 912	29 969 920	39	49
Los Angeles, CA	71 727	4 913 351	California	559 821	31 026 855	13	16
Houston, TX	35 174	1 794 397	Texas	298 138	13 384 958	12	13
Chicago, IL	29 812	3 423 774	Illinois	177 057	13 884 278	17	25
Dallas, TX	21 787	1 407 552	Texas	298 138	13 384 958	7	11
San Diego, CA	21 338	1 000 138	California	559 821	31 026 855	4	3
San Francisco, CA	19 894	1 907 688	California	559 821	31 026 855	4	6
Phoenix, AZ	16 575	834 450	Arizona	60 567	2 910 886	27	29
San Antonio, TX	14 393	723 657	Texas	298 138	13 384 958	5	5
Seattle, WA	13 633	814 466	Washington	90 285	4 689 046	15	17
Philadelphia, PA	13 533	1 820 009	Pennsylvania	167 362	13 339 231	8	14

Women-owned firms with gross receipts of $1 million or more accounted for 53.1 percent of the total gross receipts but only 0.8 percent of the total number of firms. Thirty-nine percent of the firms had gross receipts of less than $5 thousand.

WOMEN-OWNED FIRMS COMPARED TO ALL FIRMS

Women-owned firms accounted for 30 percent of all firms in the United States and 13.9 percent of gross receipts. The largest portion of firms owned by women was in services, with 38.2 percent of all firms and 14.7 percent of gross receipts. Women are particularly concentrated in social services, where they own 83.3 percent of all firms and account for 55.7 percent of gross receipts and educational services with 61.3 percent of all firms and 35.3 percent of gross receipts.

The percentage of all firms owned by women is directly related to the receipts size of the firm. For example, women owned 40.9 percent of the firms with receipts less than $5,000, but only 13.5 percent of the firms with receipts of $1 million or more. Women owned 34.3 percent of the firms with no paid employees but only 14.3 percent of the firms with 100 employees or more.

Table 1. **Statistics for Women-Owned Firms by Major Industry Group: 1987 and 1982**

[This table is based on the 1972 SIC system. For meaning of abbreviations and symbols, see introductory text. For explanation of terms, see appendix A]

SIC code	Major industry group	1987 All firms: Firms (number)	1987 All firms: Sales and receipts ($1,000)	1987 Firms with paid employees: Firms (number)	1987 Firms with paid employees: Sales and receipts ($1,000)	1987 Firms with paid employees: Employees (number)	1987 Firms with paid employees: Annual payroll ($1,000)	1982 All firms: Firms (number)	1982 All firms: Sales and receipts ($1,000)	1982 Firms with paid employees: Firms (number)	1982 Firms with paid employees: Sales and receipts ($1,000)	1982 Firms with paid employees: Employees (number)	1982 Firms with paid employees: Annual payroll ($1,000)
	All industries	4 114 787	278 138 117	618 198	224 608 218	3 102 886	40 884 883	2 612 621	98 291 813	311 883	85 347 449	1 384 888	11 188 289
	Agricultural services, forestry, and fishing	47 878	1 962 818	9 377	1 391 382	34 689	387 818	19 487	686 738	2 843	408 228	8 888	77 475
07	Agricultural services	40 806	1 731 303	8 651	1 303 111	23 556	281 178	15 302	582 080	2 487	365 289	7 980	67 137
08	Forestry	1 300	82 095	186	37 698	803	7 268	787	31 346	140	17 302	483	4 134
09	Fishing, hunting, and trapping	5 873	148 420	680	50 473	330	9 475	3 408	82 352	216	26 065	645	6 204
	Mining	26 430	1 883 822	1 942	1 436 188	11 882	271 848	19 882	2 320 846	1 388	1 323 480	11 882	288 677
10	Metal mining	200	14 801	33	10 776	183	2 880	282	17 688	30	12 487	342	3 137
11	Anthracite mining	27	5 858	5	1 170	28	320	131	28 222	30	14 276	314	2 465
12	Bituminous coal and lignite mining	186	213 880	117	204 732	2 104	44 844	107	148 862	99	148 216	1 468	28 647
13	Oil and gas extraction	25 449	1 328 428	1 518	880 902	8 309	145 380	18 778	1 019 688	1 021	1 055 714	8 222	181 844
14	Nonmetallic minerals, except fuels	558	372 845	268	380 800	3 386	78 804	584	106 645	188	94 787	1 386	21 894
	Construction	94 386	20 302 124	38 178	17 882 438	180 330	3 886 288	58 881	4 884 914	13 381	3 304 678	58 211	886 821
15	General building contractors	21 306	7 824 784	10 237	6 847 545	48 711	881 813	11 088	1 483 888	3 882	1 137 749	15 217	187 224
16	Heavy construction contractors	2 409	2 322 928	1 507	2 272 808	16 663	491 184	1 864	349 187	715	286 261	3 840	76 621
17	Special trade contractors	67 138	9 152 017	23 733	8 338 738	113 442	2 440 849	44 853	2 488 926	8 881	1 812 328	36 425	632 301
6552	Subdividers and developers	3 467	1 202 415	701	873 645	3 622	71 513	1 186	235 735	183	88 532	829	6 876
	Manufacturing	88 980	30 914 880	38 988	29 983 879	383 938	6 840 983	44 908	5 382 877	10 229	4 788 368	88 470	1 128 187
20	Food and kindred products	4 282	4 219 129	1 445	4 164 485	31 880	888 835	986	747 728	686	718 788	8 880	101 844
21	Tobacco manufactures	4	(D)	4	(D)	(D)	(D)	2	(D)	2	(D)	(D)	(D)
22	Textile mill products	2 431	1 234 928	576	1 214 043	17 480	285 874	884	87 234	180	80 117	1 836	24 080
23	Apparel and other textile products	17 827	2 840 867	4 118	2 502 282	64 825	648 802	4 718	825 758	1 247	461 886	21 825	188 253
24	Lumber and wood products	6 899	2 434 868	2 185	2 346 844	28 729	484 500	2 863	389 894	808	365 145	6 286	77 606
25	Furniture and fixtures	2 786	856 865	618	827 121	14 863	251 407	868	83 047	280	82 010	2 120	22 071
26	Paper and allied products	784	1 014 489	239	1 008 121	10 253	216 368	88	85 083	78	84 205	1 224	18 062
27	Printing and publishing	18 701	3 899 007	6 888	3 770 744	53 371	1 084 897	12 862	846 739	2 840	687 146	14 825	177 084
28	Chemicals and allied products	670	1 240 286	350	1 226 445	8 121	209 820	243	186 720	130	182 080	1 047	18 883
29	Petroleum and coal products	65	(D)	43	(D)	(D)	(D)	21	(D)	21	(D)	(D)	(D)
30	Rubber and miscellaneous plastics products	1 551	1 488 619	588	1 451 510	18 297	367 774	236	151 132	183	148 377	2 880	37 072
31	Leather and leather products	1 197	238 736	211	238 154	2 485	45 626	315	27 749	77	24 152	873	7 101
32	Stone, clay, and glass products	8 702	1 146 563	1 325	1 078 888	10 319	230 672	7 703	230 570	880	170 017	2 815	38 089
33	Primary metal industries	461	745 045	255	739 154	7 093	157 501	274	67 342	118	63 121	1 303	18 681
34	Fabricated metal products	4 314	2 795 335	1 806	2 697 883	30 871	678 249	1 047	453 458	885	438 718	7 348	113 386
35	Machinery, except electrical	3 849	2 313 900	2 222	2 281 974	27 840	704 488	1 254	472 845	841	461 887	7 843	141 035
36	Electric and electronic equipment	3 203	1 214 163	703	1 179 794	16 031	324 621	649	134 856	218	125 258	2 217	28 772
37	Transportation equipment	692	884 095	445	875 644	10 824	213 792	282	138 150	164	134 360	1 886	30 655
38	Instruments and related products	815	439 182	368	427 868	5 380	129 826	152	51 100	108	49 548	780	13 026
39	Miscellaneous manufacturing industries	13 447	1 563 324	2 410	1 408 898	15 868	304 233	9 822	621 836	1 215	381 341	7 124	77 706
	Transportation and public utilities	79 798	10 938 278	19 083	9 488 317	108 388	1 798 272	38 944	3 238 883	8 431	2 880 61/	38 880	484 212
41	Local and interurban passenger transit	8 370	471 167	1 623	359 110	12 808	124 829	3 383	155 774	622	114 978	5 168	37 612
42	Trucking and warehousing	27 419	4 854 288	8 613	3 815 820	48 885	863 483	16 187	1 341 877	3 676	829 132	15 888	216 015
44	Water transportation	1 538	(D)	560	360 800	4 005	72 063	789	(D)	264	(D)	(D)	(D)
45	Transportation by air	1 564	248 601	257	211 143	2 567	64 676	782	86 881	180	74 219	1 075	18 882
46	Pipe lines, except natural gas	2	(D)	-	-	-	-	4	(D)	2	(D)	(D)	(D)
47	Transportation services	30 406	3 888 200	6 459	3 859 347	24 808	357 823	13 738	1 281 849	2 913	1 103 123	10 186	118 286
48	Communication	7 889	888 330	1 088	788 386	10 917	181 706	1 382	144 087	384	122 083	3 782	42 487
49	Electric, gas, and sanitary services	2 881	388 711	474	305 611	2 178	43 882	2 889	98 886	480	88 038	1 864	14 082
	Wholesale trade	82 513	42 804 568	22 681	40 324 930	187 833	4 088 924	32 880	8 188 824	8 784	8 241 442	48 873	888 24(
50	Wholesale trade—durable goods	42 999	18 796 735	12 527	17 546 868	83 579	2 138 534	11 480	3 882 852	4 880	3 547 137	24 783	372 0(:
51	Wholesale trade—nondurable goods	39 514	24 007 823	10 154	22 778 262	94 254	1 930 390	20 880	5 298 572	4 124	4 694 305	24 880	316 14
	Retail trade	798 882	85 417 625	188 302	74 424 387	1 680 687	9 784 491	681 388	36 881 430	110 463	28 788 888	641 483	3 288 81
52	Building materials and garden supplies	11 297	4 096 334	5 550	3 888 550	33 338	515 002	9 537	1 186 484	3 284	988 816	12 379	123 97
53	General merchandise stores	10 184	1 187 786	2 856	1 002 475	13 801	124 836	6 282	1 181 919	1 744	1 036 555	8 210	65 79
54	Food stores	48 469	14 427 757	22 614	12 976 255	140 547	1 232 332	36 774	6 046 897	13 647	4 880 919	82 953	410 13
55	Automotive dealers and service stations	20 842	20 223 543	10 899	19 359 731	86 844	1 615 275	14 000	4 753 573	6 206	4 045 448	27 936	380 76
56	Apparel and accessory stores	40 582	5 215 885	19 882	4 545 279	71 830	589 737	27 865	2 445 880	11 489	1 832 883	39 067	232 44
57	Furniture and home furnishings stores	30 037	4 889 740	11 159	4 342 327	43 232	588 286	18 105	1 465 284	4 876	1 168 381	16 137	144 1(
58	Eating and drinking places	90 848	14 167 029	59 886	13 180 317	507 454	3 214 048	66 182	6 884 283	38 028	5 786 521	254 064	1 230 71
59	Miscellaneous retail	546 353	21 180 461	66 567	15 149 444	183 651	1 875 085	454 784	12 087 840	40 171	7 141 443	120 727	800 71
	Finance, insurance, and real estate	437 380	17 833 482	38 741	9 338 301	188 312	1 880 576	248 403	6 388 832	18 463	2 830 331	48 138	882 2(
60	Banking	270	152 921	260	152 447	2 086	41 292	2 076	203 654	246	174 186	2 857	40 6
61	Credit agencies other than banks	747	333 861	539	312 017	4 650	88 461	348	86 713	176	88 760	1 257	17 8
62	Security, commodity brokers and services	7 823	592 911	956	412 490	3 386	101 304	1 386	357 000	224	132 016	1 281	28 3
63	Insurance carriers	804	115 967	274	98 169	1 466	35 650	181	16 340	83	13 296	257	2 8
64	Insurance agents, brokers, and service	53 207	2 305 728	8 948	1 859 518	20 741	388 574	28 184	881 632	3 886	480 839	8 281	101 1
65 pt.	Real estate[1]	335 429	12 641 097	24 008	6 807 283	68 249	1 010 368	211 885	4 732 788	11 459	1 808 895	34 279	390 1
66	Combined real estate, insurance, etc.	38 833	899 422	1 612	150 214	1 687	30 075	835	28 155	186	20 868	491	4 1
67 pt.	Holding and other investment offices[2]	647	791 495	144	734 183	6 157	146 848	600	84 870	102	80 383	313	4 1
	Services	2 380 038	81 123 480	253 276	38 670 288	1 615 871	11 634 738	1 284 887	26 277 751	122 882	14 148 174	480 744	3 884
70	Hotels and other lodging places	22 211	3 201 429	8 442	2 832 314	76 476	714 638	17 487	1 870 740	5 713	1 361 826	45 012	312
72	Personal services	561 895	10 289 420	73 873	6 573 008	203 081	1 756 595	394 886	5 500 114	44 009	2 789 414	138 034	888
73	Business services	880 494	18 935 829	62 015	11 880 465	302 463	3 787 228	‡	‡	18 970	2 707 276	91 910	777
75	Auto repair, services, and garages	23 481	2 643 526	9 396	2 346 052	38 524	882 788	10 891	829 462	4 060	752 840	15 511	174
76	Miscellaneous repair services	24 027	1 187 251	5 729	825 047	15 436	240 868	13 273	480 219	2 221	278 782	6 213	88

See footnotes at end of table.

Table 1. Statistics for Women-Owned Firms by Major Industry Group: 1987 and 1982—Con.

[This table is based on the 1972 SIC system. For meaning of abbreviations and symbols, see introductory text. For explanation of terms, see appendix A]

SIC code	Major industry group	1987 All firms: Firms (number)	1987 All firms: Sales and receipts ($1,000)	1987 Firms with paid employees: Firms (number)	1987 Firms with paid employees: Sales and receipts ($1,000)	1987 Firms with paid employees: Employees (number)	1987 Firms with paid employees: Annual payroll ($1,000)	1982 All firms: Firms[1] (number)	1982 All firms: Sales and receipts ($1,000)	1982 Firms with paid employees: Firms (number)	1982 Firms with paid employees: Sales and receipts ($1,000)	1982 Firms with paid employees: Employees (number)	1982 Firms with paid employees: Annual payroll ($1,000)
	Services—Con.												
78	Motion pictures	7 853	722 178	1 307	676 791	7 773	128 856	2 827	215 285	819	188 691	4 380	30 832
79	Amusement and recreation services	99 504	3 089 788	9 841	2 064 342	41 791	817 619	44 861	1 132 068	3 579	889 851	21 200	181 218
80	Health services	235 318	8 618 420	27 818	6 261 682	161 138	1 818 588	123 111	3 888 390	19 889	2 390 838	78 585	883 798
81	Legal services	41 925	2 219 741	9 519	1 574 881	19 559	368 496	33 333	863 989	4 808	545 913	9 178	118 820
82	Educational services	104 187	1 186 804	4 634	573 194	16 885	182 705	82 613	859 403	3 647	217 493	12 023	88 298
83	Social services	389 187	5 047 449	21 209	1 393 880	70 535	868 191	2 330	228 034	2 180	225 241	14 931	83 714
84	Museums, botanical, zoological gardens	13	2 868	13	2 868	49	464	6	631	6	531	8	137
89	Miscellaneous services	169 023	6 008 917	19 779	2 876 117	62 283	687 607	‡	‡	20 634	2 022 298	65 838	440 838
	Industries not classified	184 756	4 940 071	12 819	1 286 237	11 627	282 860	235 840	4 888 499	8 881	1 888 088	14 572	180 978

[1]Excludes 6552 which is included in construction industries.
[2]Excludes 673 (Trusts) and 679 (Miscellaneous investing).

Table 2. Statistics for Women-Owned Firms by State: 1987 and 1982

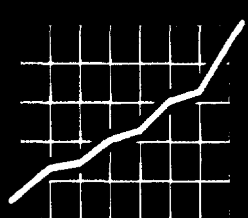
[For meaning of abbreviations and symbols, see introductory text. For explanation of terms, see appendix A]

Geographic area	1987 All firms: Firms (number)	1987 All firms: Sales and receipts ($1,000)	1987 Firms with paid employees: Firms (number)	1987 Firms with paid employees: Sales and receipts ($1,000)	1987 Firms with paid employees: Employees (number)	1987 Firms with paid employees: Annual payroll ($1,000)	1982 All firms: Firms[1] (number)	1982 All firms: Sales and receipts ($1,000)	1982 Firms with paid employees: Firms (number)	1982 Firms with paid employees: Sales and receipts ($1,000)	1982 Firms with paid employees: Employees (number)	1982 Firms with paid employees: Annual payroll ($1,000)
United States	4 114 787	278 138 117	618 198	224 806 216	3 102 685	40 884 883	2 612 621	98 291 613	311 883	85 347 449	1 364 888	11 188 380
Alabama	48 018	3 824 356	9 184	3 037 188	43 141	525 917	30 856	1 267 621	4 821	841 808	17 737	180 878
Alaska	13 876	829 326	1 929	617 879	7 216	125 285	9 489	378 943	780	288 348	3 552	48 810
Arizona	60 567	2 910 886	8 947	2 192 859	37 881	428 262	35 085	1 027 308	3 779	693 534	15 385	109 624
Arkansas	36 469	2 007 652	6 415	1 607 384	25 392	261 380	24 463	1 089 343	3 889	756 858	14 318	106 059
California	559 821	31 026 855	73 184	21 997 497	311 273	4 130 887	364 862	12 022 880	35 851	7 009 232	165 368	1 849 483
Colorado	69 411	4 280 547	12 750	3 277 813	53 788	658 882	57 370	1 829 435	6 113	1 180 878	27 287	323 772
Connecticut	60 824	5 319 710	9 297	4 237 344	61 485	825 688	36 480	1 401 205	4 408	807 812	20 107	172 384
Delaware	9 727	753 238	1 782	602 887	8 617	113 500	5 702	195 838	821	133 897	3 177	22 785
District of Columbia	10 987	774 019	1 230	584 863	9 343	158 781	8 893	333 841	780	201 094	4 288	43 416
Florida	221 361	18 828 094	39 496	13 582 428	195 448	2 430 298	125 382	4 789 745	16 765	3 180 404	73 234	576 849
Georgia	88 050	5 873 682	14 459	4 854 107	67 749	838 127	53 254	1 847 886	8 821	1 185 443	34 712	183 207
Hawaii	21 896	866 930	2 404	548 087	8 548	105 425	14 415	358 488	1 248	308 681	6 638	38 388
Idaho	18 973	813 043	3 076	838 282	10 448	105 770	13 433	427 487	1 557	294 872	6 203	43 310
Illinois	177 257	13 884 278	25 484	11 807 789	149 164	2 137 622	110 278	4 588 694	13 380	3 240 264	62 508	562 238
Indiana	89 849	8 813 422	16 571	8 006 788	115 173	1 387 803	62 015	3 191 676	9 210	2 808 767	62 084	454 148
Iowa	53 592	2 924 611	8 600	2 488 473	41 037	443 039	38 097	1 138 884	4 784	788 432	17 881	119 386
Kansas	53 505	2 880 785	7 182	2 154 808	31 015	352 572	36 770	1 234 850	4 091	800 082	18 428	125 080
Kentucky	53 454	3 265 188	8 585	2 848 483	40 767	434 037	28 558	1 582 834	4 889	1 115 779	19 288	150 644
Louisiana	55 862	2 981 708	8 388	2 289 000	38 308	410 383	38 315	2 200 975	5 227	1 821 830	28 435	271 148
Maine	23 822	1 834 638	4 003	1 388 096	20 711	287 850	14 473	420 481	1 883	287 188	5 508	41 282
Maryland	81 891	6 508 587	10 288	4 416 226	61 829	849 799	48 371	1 629 802	4 787	1 015 253	21 381	176 724
Massachusetts	111 378	11 139 810	13 885	8 455 887	107 885	1 888 101	63 182	1 777 802	5 488	1 020 883	26 304	217 889
Michigan	133 958	7 889 112	18 565	8 375 374	92 533	1 187 841	87 133	2 789 882	10 807	1 873 867	42 788	390 251
Minnesota	88 137	4 991 493	12 365	4 072 865	65 034	783 012	58 234	1 780 867	6 087	1 208 004	28 798	222 508
Mississippi	28 878	2 082 007	6 109	1 685 149	24 279	257 583	20 411	864 838	3 887	845 737	12 407	80 291
Missouri	87 658	5 346 138	13 488	4 452 888	84 403	770 361	64 080	1 889 408	8 800	1 382 800	30 110	221 343
Montana	17 747	930 377	3 256	754 388	12 538	117 895	12 782	489 100	1 825	583 201	7 380	82 498
Nebraska	32 285	1 849 048	5 048	1 381 038	21 442	234 914	22 748	718 883	2 889	508 285	11 884	78 127
Nevada	18 831	1 413 858	2 889	1 147 722	17 546	228 428	11 676	450 174	1 321	811 324	7 144	65 805
New Hampshire	22 713	1 857 788	3 865	1 644 887	20 038	292 184	11 812	381 716	1 383	248 762	6 371	40 840
New Jersey	117 373	13 553 517	19 389	11 470 775	124 865	2 129 388	63 243	3 573 040	8 887	2 881 238	40 881	380 258
New Mexico	25 397	1 166 312	4 182	907 012	15 592	159 938	18 287	678 880	2 883	377 788	8 863	63 845
New York	284 912	29 869 820	43 729	25 172 731	288 070	4 610 254	176 465	6 352 464	21 280	5 887 244	104 774	1 088 566
North Carolina	83 532	8 813 198	15 188	5 898 499	85 625	1 057 189	67 374	1 889 808	7 481	1 827 741	27 407	203 805
North Dakota	12 889	571 701	2 288	476 712	8 626	82 007	8 770	240 081	1 309	282 384	4 805	35 848
Ohio	164 084	9 872 189	22 007	7 220 879	118 798	1 370 880	102 519	3 815 026	12 180	2 547 380	82 440	401 128
Oklahoma	63 890	2 947 868	8 809	2 208 514	35 516	387 101	49 183	2 123 012	6 050	1 258 644	22 897	184 357
Oregon	58 941	4 279 187	9 529	3 857 505	46 222	572 858	40 479	1 367 284	6 111	843 009	21 868	185 180
Pennsylvania	187 382	13 339 231	26 831	11 067 283	147 109	1 880 437	108 159	4 188 425	13 853	2 810 334	61 676	488 412
Rhode Island	14 517	1 340 182	2 488	1 123 309	15 887	227 064	8 032	270 337	1 031	164 890	4 082	32 134
South Carolina	42 804	2 949 655	7 524	2 383 926	37 934	485 081	27 066	863 220	3 780	844 700	12 208	82 118
South Dakota	13 374	726 047	2 233	618 391	9 800	96 082	8 867	308 044	1 248	271 884	4 888	34 726
Tennessee	67 445	4 226 269	11 188	3 370 530	51 353	614 443	44 843	1 707 481	6 254	1 138 238	22 841	171 383
Texas	288 138	13 384 858	40 421	9 716 787	143 851	1 763 084	189 758	8 074 340	21 029	4 833 288	80 878	829 748
Utah	29 810	1 382 428	3 885	1 093 769	18 478	212 827	19 072	864 507	1 884	483 858	8 138	74 888
Vermont	13 802	788 092	2 508	818 480	10 277	112 948	8 044	288 798	1 083	188 352	3 887	26 177
Virginia	84 418	6 951 818	13 755	4 783 810	72 888	827 966	58 882	1 763 387	6 336	1 206 072	28 827	229 212
Washington	80 285	4 889 048	13 218	3 733 756	56 993	709 509	59 298	1 598 881	6 409	1 023 880	24 315	188 804
West Virginia	22 549	1 114 228	3 868	890 779	14 567	148 069	15 730	615 851	2 297	441 376	8 865	69 190
Wisconsin	89 185	4 887 030	12 192	3 998 151	62 419	718 192	44 413	1 562 085	6 788	1 108 418	30 860	203 827
Wyoming	10 798	523 808	1 893	422 874	7 101	70 882	8 393	312 486	1 227	210 873	4 735	38 804

Exhibit 3

WOMEN-OWNED BUSINESSES: BREAKING THE BOUNDARIES

THE PROGRESS AND ACHIEVEMENT OF WOMEN-OWNED ENTERPRISES



The National Foundation for Women Business Owners and Dun & Bradstreet Information Services

April 1995

A REPORT

WOMEN-OWNED BUSINESSES:

BREAKING THE BOUNDARIES

A REPORT ON THE PROGRESS AND ACHIEVEMENT OF WOMEN-OWNED ENTERPRISES

1100 Wayne Avenue
Suite 830
Silver Spring, MD
20910-5603

APRIL 1995

Dun & Bradstreet Information Services is proud to partner with the National Foundation for Women Business Owners (NFWBO) to produce this comprehensive, empirical study on the state of women-owned businesses in the United States. The idea for the study was the Foundation's, and the organization has been an outstanding partner throughout its development. We are pleased to have produced together a study that documents the power of women-owned businesses in the nation's economy.

The study's powerful results, which are captured in this report, "Women-Owned Businesses: Breaking the Boundaries," are important to a wide range of groups in the business community—from bankers and marketers to potential suppliers and partners. This study documents the enormous progress that women-owned businesses have made in the past few years.

The study and its findings are also important to Dun & Bradstreet. As the world's largest provider of business-to-business financial, credit and marketing information, we take pride in the integrity and usefulness of the records we maintain on more than 38 million businesses around the world.

We are pleased that, by providing access to our information and participating in the study's analysis, we have contributed to the production of this report. And we know that the NFWBO's dedication to supporting and advancing women-owned businesses will ensure that this information will be widely disseminated to help us all better understand the achievements and significance of women-owned businesses.

David T. Kresge

David T. Kresge, Ph.D

Senior Vice President, Analytical Services

Dun & Bradstreet Information Services, North America

The emergence of women-owned businesses as an increasingly potent economic force has been one of the defining trends of the past decade. This report demonstrates the continued progress and growth of women-owned firms in this country. For me, as a woman entrepreneur, there is a sense of pride and excitement at the level of achievement and economic contribution which these statistics document.

Today, there are 7.7 million women-owned businesses in the U.S., providing over one-third more jobs in the U.S. than the Fortune 500 companies provide worldwide. Women-owned businesses are soaring beyond the curve, exhibiting above-average growth rates in numbers of firms and employment. Further, this report shows that these businesses are as financially sound and creditworthy as all U.S. firms.

In 1992, the National Foundation for Women Business Owners' first report of statistics on women-owned businesses stunned the business world by documenting women-owned firms' economic force and began changing the way these businesses are viewed. Economic policy makers, financial decision makers and corporate leaders started to focus on women-owned businesses.

Our hope is that this report will further strengthen the recognition of the vital role women-owned businesses play in the present and future health of our country's economy, thus creating opportunities for every woman business owner.

On behalf of all the women business owners whose accomplishments are documented in this report, we thank Dun & Bradstreet Information Services for collaborating with us. Certainly access to their business database, the most comprehensive in the U.S., was essential. More important, their substantive collaboration in the economic analysis and report preparation demonstrates their recognition of the seriousness and significance of women-owned businesses.

Our gratitude also goes to two corporations which have supported every major National Foundation for Women Business Owners' research project over the last four years, AT&T and IBM. Thanks to them the body of knowledge about women-owned businesses has grown significantly. Their generosity has made this report possible.

Laura Henderson

Laura Henderson

Chair, The National Foundation for Women Business Owners

President and CEO, Prospect Associates